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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-md-05944-SC (N.D. Cal)
MDL No. 1917

This Document Related to:

Individual Case No. 3:13-cv-2171 (SC),
*Dell Inc.; Dell Products L.P., v. Philips
Electronics North America Corporation et al.*;

Individual Case No. 3:13-cv-01173-SC,
*Sharp Electronics Corp., et al. v. Hitachi, Ltd.,
et al.*

Individual Case No. 3:13-cv-2776 SC,
*Sharp Electronics Corp. et al. v. Koninklijke
Philips Elecs., N.V. et al.*

**DECLARATION OF CLAIRE YAN IN
SUPPORT OF LG DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL
IN SUPPORT OF DEFENDANTS' REPLY
IN SUPPORT OF JOINT MOTION FOR
PARTIAL SUMMARY JUDGMENT**

[Administrative Motion to Seal and [Proposed]
Order filed concurrently]

Judge: Hon. Samuel Conti
Date: February 6, 2015
Time: 10:00 A.M.
Crtrm.: 1, 17th Floor

1 I, Claire Yan, hereby declare:

2 1. I am an attorney with the law firm of Munger, Tolles & Olson LLP, counsel of
3 record for Defendants LG Electronics, Inc. (“LGE”), in the above entitled action. I am licensed in
4 the State of California and admitted to practice before this Court. I make this declaration based on
5 my personal knowledge and, if called upon as a witness, could and would testify competently as to
6 the matters set forth below.

7 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of
8 the LGE Defendants’ Administrative Motion to Seal.

9 3. Defendants seek permission to file under seal the highlighted portions of the
10 sealed version of:

11 (a) Defendants’ Reply in Support of Joint Motion for Partial Summary
12 Judgment Against Dell and Sharp Plaintiffs on Statute of Limitations Grounds.

13 4. The portions the document referenced in Paragraph 3 contain discussion,
14 analysis, references to, or information taken directly from, material designated by the Sharp and
15 Dell Plaintiffs this matter as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” under the
16 Stipulated Protective Order (Dkt. No. 306) in this case.

17 5. Defendants further seek permission to file under seal the following documents in
18 their entirety:

19 (a) Exhibits 4 through 10 to the Declaration of Claire Yan in Support of
20 Defendants’ Reply in Support of Joint Motion for Partial Summary Judgment Against Dell and
21 Sharp Plaintiffs on Statute of Limitations Grounds (“Yan Suppl. Decl.”)

22 6. The documents referenced in paragraph 5(a) have been designated
23 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” by the Sharp and Dell Plaintiffs under the
24 Stipulated Protective Order (Dkt. No. 306).

25 7. LGE seeks to submit the above material under seal in good faith in order to
26 comply with the Stipulated Protective Order in this action and the applicable Local Rules.
27 Because the information LGE seeks to submit under seal has been designated as Confidential or
28 Highly Confidential by the other parties, LGE is filing the accompanying Administrative Motion,

1 and will be prepared to file unredacted versions of the above-referenced documents in the public
2 record if required by Civil Local Rule 79-5(e).

3 I declare under penalty of perjury under the laws of California that the foregoing is true
4 and correct.

5 Executed on the 23rd day of January, 2015 in Los Angeles, California.

6
7
8 /s/ Claire Yan

9 CLAIRE YAN

10 Attorneys for Defendants LG Electronics, Inc.